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d/b/a TCS America

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)

(Jointly Administered)

**REQUEST FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE
EXPENSE CLAIM OF TATA AMERICA INTERNATIONAL CORPORATION**

Tata America International Corporation d/b/a TCS America (“TCS”), by and through its undersigned counsel, hereby requests (the “Request”) allowance of its administrative expense claim for post-petition services rendered to the above-captioned debtors (the “Debtors”) pursuant to 503(b)(1) of title 11 of the United States Code (the “Bankruptcy Code”). TCS also requests payment of the Administrative Expense Claim pursuant to the Plan (defined below). In support of this Request, TCS respectfully represents as follows:

1. On May 14, 2012 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.
2. The Debtors and TCS are parties to a Master Services Agreement (“MSA”) under which TCS provides certain IT services to the Debtors.
3. On December 11, 2013, this Court entered an *Order Confirming Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official*

Committee of Unsecured Creditors [D.I. 6065] (the “Confirmation Order,” confirming the “Plan”).

4. As of December 17, 2013, the Debtors owed TCS \$16,341 (the “Administrative Expense Claim”) under the following two statements of work¹ for services rendered to the Debtors under the MSA pospetition, which amount remains unpaid:

ESTSOW 043	\$ 6,758
ESTSOW 002	<u>\$ 9,583</u>
Total:	<u>\$16,341</u>

5. The post-petition services TCS provided to the Debtors during these cases benefitted and preserved the Debtors’ estates. Accordingly, TCS is entitled to an allowed Administrative Expense Claim pursuant to section 503(b)(1) of the Bankruptcy Code, and requests payment of its Administrative Expense Claim pursuant to the Plan.

RESERVATION OF RIGHTS

6. TCS reserves its right to amend and/or supplement this Request. TCS files this Request without prejudice to any other claims TCS may hold against the Debtors.

¹ The statements of work and corresponding invoices contain confidential information and will be provided to the Liquidating Trustee, U.S. Trustee and the Court upon request and entry of appropriate confidentiality protections.

CONCLUSION

WHEREFORE, TCS respectfully requests that its Administrative Expense Claim
(i) be allowed in the amount of \$16,341 and (ii) be paid as an Allowed Administrative Expense
Claim under the Plan.

Dated: New York, New York
January 16, 2014

KLESTADT & WINTERS LLP

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